

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
HARRISONBURG DIVISION**

SHERMAN-STOLTZ LAW GROUP, PLLC,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 5:21-CV-00004
)	
NEXUS SERVICES, INC.,)	
)	
Defendant.)	

PLAINTIFF’S MOTION FOR SUMMARY JUDGMENT AND OTHE RELIEF

Plaintiff Sherman-Stoltz Law Group, PLLC (“Plaintiff” or “SSLG”), by counsel, hereby moves this Court, pursuant to Rule 56(a) of the Federal Rues of Civil Procedure, to enter summary judgment against Defendant Nexus Services, Inc. (“Defendant” or “Nexus”). For the reasons stated in SSLG’s accompanying Memorandum in Support of its Motion for Summary Judgment and Other Relief, SSLG respectfully requests that the Court grant summary judgment in its favor and against Nexus and enter a judgment in the amount of \$791,010.42 against Nexus.

Respectfully submitted,

SHERMAN-STOLTZ LAW GROUP,
PLLC

By: /s/Francis H. Casola

Francis H. Casola, Esq. (VSB No. 29108)
casola@woodsrogers.com
WOODS ROGERS PLC
P.O. Box 14125
Roanoke, VA 24038-4125
Phone: (540) 983-7600
Fax: (540) 983-7711

Counsel for Plaintiff Sherman-Stoltz Law Group, PLLC

CERTIFICATE OF SERVICE

This 14th day of January, 2022, undersigned counsel caused the foregoing pleading to be filed on the Court's CM/ECF system which will deliver notice to all participants, including:

Christopher M. Okay, Esq. (VSB #35611)
117 S. Lewis Street, Suite 218
Staunton, Virginia 24401
Counsel for Defendant

/s/ Francis H. Casola